

**BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

IN RE AFTERMARKET FILTERS  
ANTITRUST LITIGATION

MDL DOCKET NO. 1957

**S&E QUICK LUBE DISTRIBUTORS, INC., FLASH SALES, INC., WILLIAM C. BRUENE D/B/A LONE STAR LUBE, T.D.S. COMPANY D/B/A TWI AUTO PARTS & SUPPLIES, AND BARJAN, LLC'S SUPPLEMENTAL MEMORANDUM IN SUPPORT OF TRANSFER AND CONSOLIDATION OF RELATED ANTITRUST ACTIONS  
IN THE DISTRICT OF CONNECTICUT**

S&E Quick Lube Distributors, Inc. ("S&E Quick Lube") – plaintiff in the first-filed case in the above-referenced litigation filed in the U.S. District Court for the District of Connecticut – and Flash Sales, Inc., William C. Bruene d/b/a Lone Star Lube, T.D.S. Company d/b/a TWI Auto Parts & Supplies, and Barjan, LLC – plaintiffs in other early-filed actions (collectively, "Moving Plaintiffs") – respectfully submit this Supplemental Memorandum in Support of their Motion for Transfer and Consolidation of Related Antitrust Actions in the District of Connecticut before the Honorable Janet Bond Arterton.

On April 15, 2008, Moving Plaintiffs filed a motion with the Panel seeking transfer and consolidation of all related actions to the District of Connecticut. And, on June 17, Moving Plaintiffs filed a Reply Memorandum in support of transfer and consolidation in the District of Connecticut. Moving Plaintiffs hereby submit this Supplemental Memorandum to update the information contained in their earlier filings with the Panel to reflect additional cases that have been filed.

As of the date of this Supplemental Memorandum, 44 actions have now been commenced in seven districts throughout the country alleging unlawful conduct in the market for aftermarket filters in violation of federal antitrust laws ("*Filters Actions*"), as set forth in the chart below:

DISTRICT	PENDING CASES
Connecticut	20
Southern District of Illinois	7
Northern District of Illinois	7
New Jersey	3
Eastern District of Tennessee	1
Middle District of Tennessee	1
Northern District of California	5
TOTAL CASES FILED	44

Currently, 12 of the 20 *Filters Actions* pending in the District of Connecticut are before the Honorable Janet Bond Arterton (the judge presiding over the first-filed *Filters Action*), 5 of which have been consolidated by Judge Arterton as *In re Filters Antitrust Litig.*, Civ. No. 3:2008-cv-00475 (JBA). Of the remaining 8 cases pending in the District of Connecticut, 6 are pending transfer to Judge Arterton.

Dated: July 25, 2008

Respectfully submitted,

/s/ Bernard Persky

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**PROOF OF SERVICE**

I, Gregory Ascioffa, hereby certify that a copy of the foregoing:

- **S&E QUICK LUBE DISTRIBUTORS, INC., FLASH SALES, INC., WILLIAM C. BRUENE D/B/A LONE STAR LUBE, T.D.S. COMPANY D/B/A TWI AUTO PARTS & SUPPLIES, AND BARJAN, LLC'S SUPPLEMENTAL MEMORANDUM IN SUPPORT OF TRANSFER AND CONSOLIDATION OF RELATED ANTITRUST ACTIONS IN THE DISTRICT OF CONNECTICUT**

and this Proof of Service was served on the parties on the attached Service List by First Class Mail on July 25, 2008.

Dated: July 25, 2008

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Gregory Ascioffa, Esq.